

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DON BRIEGER, ROBERT BECKER,
ALAN BURSTIN, HARRY SCHULTZ,
and PAULA MITCHELL,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

TELLABS, INC., et al.,

Defendants.

Case No. 1:06-cv-1882

Judge Matthew F. Kennelly

PLAINTIFFS' AND DEFENDANTS' JOINT STATUS REPORT

Per the Court's instruction, Plaintiffs and Defendants respectfully submit the following report in connection with the March 23, 2009 status conference scheduled with the Court. The issues under discussion include: 1) identification of witnesses each side will call at trial; 2) whether testimony will be presented live or via deposition; and 3) how long the expected direct examination is to take. Counsel for the parties have conferred and respectfully submit the following list of witnesses who will be called to testify at trial. Additional witnesses who may be called to testify will be identified in the Final Pretrial Order.

PLAINTIFFS' WITNESS LIST

Name	Form of Testimony	Expected Length
Harley Ball	Deposition	2 hours/1 hour defendants
Michael Birck	Live	5 hours
Bro Ballantine	Deposition	2 hours/1 hour defendants

Tom Cooke	Live	3 hours
Les Harper	Deposition	2 hours/1 hour defendants
Matthew Hutchenson	Live	4 hours/3 hours defendants
Brain Jackman	Live	4 hours
Richard Notebaert	Live	5 hours
Christine Pfefferle	Live	3 hours
Debra Ragusa	Live	3 hours
Joan Ryan	Live (if available)	5 hours
Saul Solomon	Live	5 hours/4 hours defendants
Richard Tatara	Live	3 hours/2 hours defendants
Ronald Vollmar	Live	3 hours/3 hours defendants

DEFENDANTS' WITNESS LIST

Mike Birck* ¹	Live	5 hours
Robert Becker	Live	3 hours
Don Brieger	Deposition (possibly video)	3 hours
Alan Burstin	Deposition (possibly video)	3 hours
Thomas Cooke*	Live	2 hours
Thomas Desmond	Live	3 hours
Brian Jackman*	Live	2 hours
Ken Lehn	Live	3 hours

¹ Asterisk denotes also on Plaintiffs' will call list.

Paula Mitchell	Live	3 hours
Richard Notebaert*	Live	5 hours
Chris Pfefferle*	Live	5 hours
Robert Pullen	Live	4 hours
Debra Ragusa*	Live	5 hours
David Ross	Live	2 hours
Joan Ryan*	Live (if available)	4 hours
Harry Schultz	Live	3 hours
Laura Starks	Live	4 hours

Based upon the estimated length of direct examinations, the parties respectfully request eighteen days for trial of this action.

Dated: March 20, 2009

HARWOOD FEEFFER LLP

By: /s Matthew M. Houston
Matthew M. Houston
488 Madison Avenue
New York, NY 10022
(212) 935-7400

Barroway Topaz Kessler Meltzer & Check, LLP

Edward W. Ciolko, Esq.
Mark K. Gyandoh, Esq.
Peter M Muhic
280 King of Prussia Road
Radnor, PA 19087
(610) 667-7706

The Weiser Law Firm P.C.

Robert B. Weiser, Esq.
Brett D. Stecker, Esq.
121 North Wayne Avenue
Suite 100
Wayne, PA 19087
(610) 225-2677

Lasky & Rifkind, Ltd.

Norman Rifkind, Esq.
Leigh R. Lasky, Esq.
350 N. LaSalle Street, Suite 1320
Chicago, Illinois 60610
(312) 634-0057

Counsel for Plaintiffs

-- and --

MORGAN, LEWIS & BOCKIUS LLP

By: /s Charles C. Jackson (MMH w/permission)

Charles C. Jackson
Deborah S. Davidson
77 West Wacker Drive
Chicago, IL 60601
(302) 324-1000

Counsel for Defendants